

**IN THE UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

<b>In re:</b>  <b>WC CULEBRA CROSSING SA, LP</b>  <b>Debtor.</b>	§ § § § §	<b>Case No. 21-10360-tmd</b>
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**DEBTOR’S RESPONSE TO UNITED STATES TRUSTEE’S MOTION  
TO CONVERT CASE TO CHAPTER 7  
[Dkt. No. 287]**

TO THE HONORABLE TONY M. DAVIS,  
U.S. BANKRUPTCY JUDGE:

WC Culebra Crossing SA, LP (the “**Debtor**”) files this response to the *Motion to Convert Case to Chapter 7* [Dkt. No. 287] (the “**Motion**”), filed by the U.S. Trustee and would show as follows:<sup>1</sup>

1. The Debtor has cured each filing or payment deficiency described in the Motion. In particular on this date the Debtor has filed the following monthly operating reports (each, an “**MOR**”):

- a. Amended MOR for September 2021 [Dkt. No. 300];
- b. MOR for November 2021 [Dkt. No. 298];
- c. MOR for December 2021 [Dkt. No. 301]; and
- d. MOR for January 2022 [Dkt. No. 302]

2. Additionally, the Debtor has processed payment of all fees due under 11 U.S.C. §1930(a)(6) for the fourth quarter 2021 (the “**U.S. Trustee Fees**”), in the amount of \$589.00, and

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<sup>1</sup> Capitalized terms not otherwise defined herein shall have the same meaning as defined or used in the Motion.

will pay any late charges upon confirmation of receipt of that payment.<sup>2</sup>

Because all deficiencies described in the Motion have been satisfied, the Motion should be denied.

Dated: the 7<sup>th</sup> day of March 2022.

Respectfully submitted,

FISHMAN JACKSON RONQUILLO PLLC

/s/ Mark H. Ralston

Mark H. Ralston

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COUNSEL FOR DEBTOR

WC CULEBRA CROSSING SA, LP

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<sup>2</sup> Routing No. 026013356.

**CERTIFICATE OF SERVICE**

This is to certify that the undersigned caused a true and correct copy of the foregoing Notice to be served on all persons receiving electronic notice of filings in this case through the ECF system, and on the following parties by email on this, the 7<sup>th</sup> day of March, 2022.

Seth Kretzer  
Email: Seth@kretzerfirm.com

Jason G. Cohen on behalf of Creditor Timber Culebra, LLC  
jason.cohen@bracewell.com

Howard Marc Spector on behalf of Creditor CC2 TX, LLC  
hspector@spectorcox.com,

Donald P. Stecker on behalf of Creditor Bexar County  
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United States Trustee - AU12  
ustpreion07.au.ecf@usdoj.gov

/s/ Mark H. Ralston  
Mark H. Ralston